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- said processor means maintains the dictionary containing the unambiguously entered words dependent on the storing time.

12. (new) A communications terminal according to claim 4, further including means adapted to remove or maintain words entered using said second editor application.

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#### REMARKS

##### **Status of the Claims**

Applicant has cancelled claims 7-10, amended independent claims 1 and 4, and added claims 11 and 12 to accentuate the novel features of the invention for which protection is sought in this application. Claims 1-6, 11, and 12, remain under consideration. In view of the cancellation of claims 7-10, the rejection under 35USC102(e) is moot.

Claims 1-3 stand rejected under 35USC103(a) based on the cited reference King, et al, US Patent No. 6,011,554 in view of the reference Frederiksen, U.S. Patent No. 6,185,295. In addition claims 4-6 stand rejected under 35USC103(a) based on the cited reference King, et al, in view of the reference Schoeder, et al, U.S. Patent No. 5,797,098. The Examiner is respectfully requested to reconsider his rejection in view of the above amendments and the following arguments.

##### **The Invention**

In the embodiment of the invention, as described in claims 1-3, a mobile telephone is provided with a predictive editor program

which operates to predict a word from an ambiguous string of key strokes. The predictive editor program refers to a memory which stores a vocabulary for matching the strings of key strokes. The cell phone is also supplied with an independent application program, for example, an address book which is served in normal operation by a dedicated memory. The control processor of the mobile telephone is programmed to automatically store words, entered by the application program in its memory, to the memory of the predictive editor in order to supplement the predictive editor vocabulary.

In a second embodiment of this invention, as described in amended claim 4, a mobile telephone, with the predictive editor program, is also provided with a second editor program for using unambiguous key strokes to edit the results of the predictive editor.

None of the cited references either alone or in combination teach the invention as described in amended independent claims 1 and 4.

#### **Discussion of the Cited References**

The Examiner relies primarily on the disclosure of the King, et al patent. The reference King describes a compact keyboard which provides a reduced number of keys. Each key has multiple letters which may be entered by its depression. A predictive editor is used to facilitate interpretation of the key strokes by reference to a predetermined dictionary. The reference King does not disclose the automatic entry of usable words in its predictive editor dictionary from other application software,

nor does the reference King disclose the provision of a second editor program for editing the results of the predictive editor.

In order to remedy the first of the above deficiencies of the reference King, the Examiner cites the reference Frederiksen. This cited reference discloses a speed dial system which has a limited memory directly accessible for dialing of important numbers. A larger memory is provided through the use of a SIM card. In the system of Frederiksen, the speed dialing status of a phone number in the larger memory can be exchanged for that of a number in speed dial location. The Examiner indicates that the memory on the SIM card can be copied to the memory of the phone. In fact a few of the numbers on the SIM card may be exchanged with numbers in the phone's speed dial memory. The system of Frederiksen facilitates identifying a particular number as a speed dial candidate, nothing more. There is no mention of a predictive editor having a dictionary of words which can be supplemented by use of independent application memory. In the operation of the subject invention, the dictionary of the predictive editor is automatically supplemented with words from the independent application memory by the main processing unit of the mobile terminal.

The Examiner proposes to combine the teachings of a reference describing a compact keyboard for a personal digital assistant with a reference teaching a speed dial facilitator for a mobile telephone. There is nothing in these references that would lead to such a combination. It is submitted that the Examiner has failed to support a *prima facie* case of obviousness.

With respect to claims 4-6, the Examiner cites the reference Schroeder. According to claim 4, as amended, a second editor

program, which utilizes unambiguous key strokes, provides a means of editing the results obtained with the predictive editor. The reference Schroeder does not, therefore, remedy the deficiencies of the reference King with regard to claim 4.

#### The Issue of Obviousness

The Appellants rely on the decision of the Board of Patent Appeals and Interferences in Ex parte Clapp, 227 USPQ 972, 973 (BPAI 1985) which states:

"To support the conclusion that the claimed combination is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed combination or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references."

The Examiner has presented only his unsupported opinion as a line of reasoning. Applicant submits that the Examiner has failed to establish a prima facie case under 35 USC 103a.

" In determining whether a case of prima facie obviousness exists, it is necessary to ascertain whether the prior art teachings would appear to be sufficient to one of ordinary skill in the art to suggest making the claimed substitution or other modification. The prior art must provide one of ordinary skill in the art the motivation to make the .... modification..." IN RE LALU, 747 F.2d 703

The message of the above cited case is clear namely, that there must be some teaching in the prior art indicating that the modification of the cited reference is desirable. The Examiner has not sustained his burden.

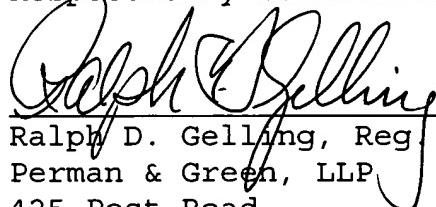
Since the cited references fail to support the rejection of the independent claims, the rejection of dependent claims also must fail. The above arguments are therefore equally applicable to the rejected dependent claims.

SUMMARY

In view of the amendments to this application and the arguments stated above, Applicant submits that the claims under consideration contain patentable subject matter and favorable action by the Examiner is respectfully requested.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



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10/16/02  
Date

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Appendix A to Response in Application No.: 09/507,945

Marked Up Specification Replacement Section

Please delete the section entitled "ABSTRACT" (page 27, line 1 - line 16) and replace with the following replacement section:

ABSTRACT

A communication terminal having a display; a keypad having a plurality of keys associated with several letters each; a processor means for controlling the display means in accordance with the operation of the keypad; a selectable predictive editor program for generating an output containing words matching a received string of ambiguous key strokes, said the predictive editor program has a number of associated vocabularies including at least one language dependent dictionary and at least one dictionary receiving user defined inputs. An editor application is controlled by the processor means which communicates with said predictive editor programs for generating matching words based on an ambiguous string of key strokes. A second memory means of the communication terminal for storing user inputted data. The processor means automatically searches the said second memory means for words and copies these words into said at least one—the dictionary for receiving user defined inputs and associated with said predictive editor program.

## Marked Up Claims

1.2. (amended) A communication terminal having:

- a display;
- a keypad for use in the operation of said communication terminal having a plurality of keys associated with several letters each;
- processor means controlling the display means—in accordance with the operation of the keypad;
- a predictive editor program for generating an output containing word matching a received string of ambiguous key strokes, said predictive editor program has having a number of associated vocabularies including at least one language dependent dictionary and at least one dictionary receiving user defined inputs stored in a first memory which serves said predictive editor program;
- an editor application controlled by the processor means communicates with said predictive editor programs for generating matching words based on an ambiguous string of key strokes;  
at least one applications program independent of said predictive editor program:

- second memory means of the communication terminal independent of said first memory means for storing user inputted data in a an electronic database, said second memory means serving said at least one applications program; and
- wherein said processor means automatically searches said second memory means for words and copies these words into said at least one dictionary for receiving user defined inputs and associated with said predictive editor program.

2. A communication terminal according to claim 1 wherein said second memory means is an electronic phonebook database containing names and associated phone numbers.

3. A communication terminal according to claim 2 wherein said electronic phonebook database is stored on a Subscriber Identity Module in a cellular phone.

4. (amended) A communication terminal having:

- a display;
- a keypad having a plurality of keys associated with several letters each;
- processor means controlling the display ~~means~~ in accordance with the operation of the keypad;

- a predictive editor program for generating an output containing words matching a received string of ambiguous key strokes, said predictive editor program has having a number of associated vocabularies including at least one language dependent dictionary and at least one dictionary receiving user defined inputs;
- an editor application controlled by the processor means communicates with said predictive editor programs for generating matching words based on an ambiguous string of key strokes; ~~, said editor application stores words that have to be entered in an unambiguous way in one of said least one dictionary receiving user defined inputs,~~
- ~~said processor means associated a storing time for the unambiguously entered words stored in dictionary receiving user defined inputs; and~~
- ~~said processor means maintains the dictionary containing the unambiguously entered words in dependence of the storing time.~~  
A second editor application controlled by said processor means for entering key strokes in an unambiguous form; wherein said second editor is used to revise, delete, and/or combine said matching words generated by said first editor application.

5. (amended) A communication terminal according to claim 4 11 wherein the processor means updates the storing time every time the word is used by the editor application.

6. A communication terminal according to claim 5 wherein the dictionary containing the unambiguously entered words is built up as a cyclic buffer, where the word having the oldest storing time is removed from the memory when a new word is added and the buffer is full.

7. A communication terminal having:

- a display;
- a keypad having a plurality of keys associated with several letters each;
- processor means controlling the display means in accordance with the operation of the keypad;
- a predictive editor program for generating an output containing word matching a received string of ambiguous key strokes;
- an editor application controlled by the processor means for editing a text based on the predictive editor programs interpretation of key strokes, and comprising:
  - means for storing string of entered words,
  - means for storing a sequence of key strokes, said sequence is updated upon the occurrence of a new key stroke, and

- being used as input to the predictive editor program,
- means for storing a list of matching words received from said predictive editor program,
  - said processor means combines the text string and one word from the list of matching words for displaying in the display of at least a part of said text string and one word from the list of matching words, said one word from the list of matching words is marked in comparison to the remaining part of the text string and added to the text string upon acknowledgement by the user.
8. A communication terminal according to claim 7 wherein the keypad has a key for requesting the processor to replace said one word from the list of matching words, and said processor handling this list of matching words as an endless loop.
9. A communication terminal according to claim 7 wherein the a keypad has a key for requesting input of a special sign from a list of special signs in the text string, and wherein the a keypad has a key for requesting the processor to replace a special sign with the next special sign from the list of special signs, and said processor handling this list of special signs as an endless loop.

10. A communication terminal according to claim 7 wherein the editor application opens a word for editing with the predictive editor program when a cursor is placed at the beginning or the ending of the word, whereby the editor application regenerates a sequence of key strokes based on the presently displayed match, and whereby the editor application adds new key strokes to the regenerated sequence of key strokes in dependence of the position of the cursor and the key pressed.

11. (new) A communications terminal according to claim 4, wherein said editor application stores words that have to be entered in an unambiguous way in one of said least one dictionary receiving user defined inputs;

- said processor means associates a storing time for the unambiguously entered words stored in said dictionary receiving user defined inputs; and
- said processor means maintains the dictionary containing the unambiguously entered words in dependence of dependent on the storing time.

12. (new) A communications terminal according to claim 4, further including means adapted to remove or maintain words entered using said second editor application.